

1 GAIL SHIFMAN (State Bar No. 147334)
2 Attorney at Law
3 44 Montgomery Street, Suite 3850
4 San Francisco, California 94104
5 Telephone: (415) 551-1500
6 Facsimile: (415) 551-1502

7 Attorney for Defendant
8 HUNG TIEU

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,) Case No.: CR 11-0097 CRB (JCS)
12)
13 Plaintiff,) STIPULATION & ~~PROPOSED~~ ORDER
14 vs.) MODIFYING CONDITIONS OF RELEASE
15) AND RECONVEYING PROPERTY
16 HUNG TIEU,)
17)
18 Defendant.)

19 The parties by and through their attorneys stipulate and agree that Defendant Hung
20 Tieu's conditions of release shall be modified as follows:

- 21 1. The Clerk of the Court shall forthwith reconvey the property located at 1232
22 Marlesta to Eric Chan and Gina Tu-Chan enabling them to refinance their property
23 with an anticipated closing date of January 16, 2012. The refinancing will not impact
24 the equity in the home posted as security for Defendant's release.
- 25 2. Following the closing, this property shall be reposted as security for Defendant's
26 release, on or before January 30, 2012.

1 3. All other conditions shall remain the same.

2
3 Dated: January 6, 2012

/s/ Robert Rees

4 Robert Rees
Assistant United States Attorney

5
6 Dated: January 6, 2012

/s/ Gail Shifman

7 Gail Shifman
8 Attorney for Defendant Hung Tieu

9 ~~[PROPOSED]~~ ORDER

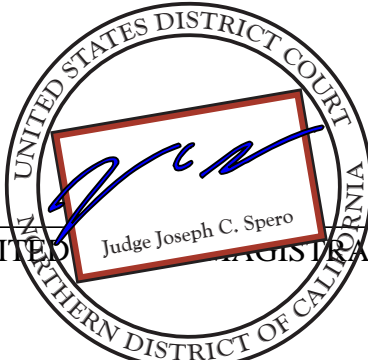
10 This matter having come before the Court upon the Stipulation of the parties and the
11 Court being informed,

12 It is ORDERED that Defendant Hung Tieu's conditions of release shall be modified as
13 follows:
14

- 15 1. The Clerk of the Court shall forthwith reconvey the property located at 1232
16 Marlesta to Eric Chan and Gina Tu-Chan enabling them to refinance their property
17 with an anticipated closing date of January 16, 2012. The refinancing will not impact
18 the equity in the home posted as security for Defendant's release.
19
20 2. Following the closing, this property shall be reposted as security for Defendant's
21 release, on or before January 30, 2012.
22
23 3. All other conditions shall remain the same.

24 Dated: January 9, 2012

25
26
27
28



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
JUDGE JOSEPH C. SPERO
UNITED STATES DISTRICT JUDGE